

UNITED STATES OF AMERICA  
CONSUMER PRODUCT SAFETY COMMISSION

In the Matter of	)	CPSC DOCKET 12-1
	)	CPSC DOCKET 12-2
	)	CPSC DOCKET 13-2
MAXFIELD AND OBERTON HOLDINGS, LLC	)	(Consolidated)
ZEN MAGNETS, LLC	)	
STAR NETWORKS USA, LLC	)	Hon. Dean C. Metry
	)	Administrative Law Judge
Respondents.	)	
	)	

**RESPONDENT CRAIG ZUCKER’S MOTION FOR LEAVE TO FILE REPLY TO  
COMPLAINT COUNSEL’S RESPONSE TO MOTION TO COMPEL**

Respondent Craig Zucker (“Mr. Zucker”) files this motion for leave to file a reply to Complaint Counsel’s opposition to Mr. Zucker’s motions pursuant to 16 C.F.R. § 1025.36, seeking to compel discovery, and in support thereof states:

1. On March 31, 2014, Mr. Zucker filed three Motions to Compel Discovery seeking to compel additional responses from Complaint Counsel to discovery propounded by Mr. Zucker.
2. On April 2, 2014, Complaint Counsel filed an Expedited Motion to Stay Respondent Craig Zucker’s Motions to Compel or Extension of Time, seeking to stay responses to the motions to compel, or additional time within which to respond.
3. By Order entered April 3, 2014, this Court ordered that responses to the motions be filed by April 18, 2014, thereby granting Complaint Counsel an additional eight (8) days to respond.
4. Mr. Zucker seeks leave to file a Memorandum of Law in reply to Complaint Counsel’s opposition to address important issues raised for the first time in the opposition.

5. The rules governing this proceeding permit the Presiding Officer to grant leave to file a reply to an opposition to a motion. 16 C.F.R. § 1025.23(c).

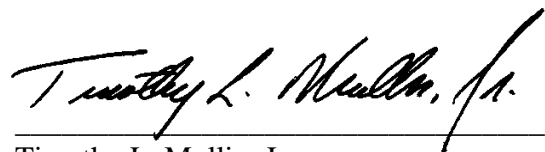
6. In light of the number of issues involved, Mr. Zucker also requests an additional four (4) days (beyond the ten (10) days permitted to respond to a motion) to file a reply to the response, so that the reply would be due on May 2, 2014.

WHEREFORE, Respondent Craig Zucker requests the entry of an order:

A. Granting Mr. Zucker leave to file a Memorandum of Law in reply to Complaint Counsel's response to Mr. Zucker's motions to compel; and

B. Granting Mr. Zucker until May 2, 2014 within which to file such a Memorandum of Law; and

C. Granting to Respondent Craig Zucker such other and further relief as justice and its cause require.



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Co-Counsel for Respondent, Craig Zucker

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 25 day of April, 2014, copies of **Respondent Craig Zucker's Motion for Leave to File Reply to Complaint Counsel's Response to Motion to Compel and Proposed Order** was sent by the service method indicated:

Original and three copies by U.S. mail, and one copy by electronic mail, to the Secretary of the U.S. Consumer Product Safety Commission:

Todd A. Stevenson  
Secretary  
U.S. Consumer Product Safety Commission  
4330 East West Highway  
Bethesda, MD 20814  
tstevenson@cpsc.gov

One copy by U.S. mail and one copy by electronic mail to the Presiding Officer for *In the Matter of Maxfield and Oberton Holdings, LLC*, CPSC Docket No. 12-1; *In the Matter of Zen Magnets, LLC*, CPSC Docket No. 12-2, and *In the Matter Of Star Networks UA, LLC*, CPSC Docket No. 13-2:

The Honorable Dean C. Metry  
U.S. Coast Guard  
U.S. Courthouse  
601 25<sup>th</sup> Street, Suite 508A  
Galveston, TX 77550  
Janice.M.Emig@uscg.mil

One copy by electronic mail (by agreement) to Complaint Counsel:

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One copy by electronic mail (by agreement) to counsel for Respondents Zen Magnets, LLC and Star Networks USA, LLC:

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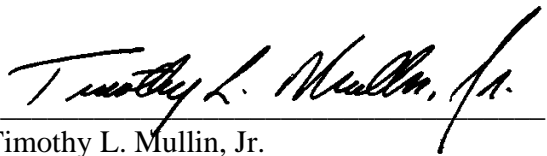
One copy by electronic mail (by agreement) to co-counsel for Craig Zucker:

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One copy by electronic mail (by agreement) to counsel for MOH Liquidating Trust:

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